

ORIGINAL

DOW, LOHNES & ALBERTSON, PLLC
ATTORNEYS AT LAW

WASHINGTON, D.C.

LAURA H. PHILLIPS
DIRECT DIAL 202-776-2824
lphillips@dlalaw.com

1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222

DOCKET FILE COPY ORIGINAL
ONE RAVINIA DRIVE SUITE 1600
ATLANTA, GEORGIA 30346-2108
TELEPHONE 770-901-8800
FACSIMILE 770-901-8874

September 29, 1997

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SEP 29 1997

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street
Washington, D.C. 20554

Re: Universal Service CC Docket No. 96-45 /
Telephone Number Portability CC Docket No. 95-116
EX PARTE PRESENTATION

Dear Mr. Caton:

On Friday, September 26, 1997, Jeffrey E. Smith, Esq. and Mr. James R. Coltharp, of Comcast Cellular Communications Inc. ("Comcast"), and Brian Fontes of the Cellular Telecommunications Industry Association met with Lawrence E. Strickling, Chairman of the Commission's Local Competition Task Force, regarding the above-referenced proceedings. During that meeting, Comcast discussed the impact of the Commission's universal service proceeding and number portability rules on Comcast's CMRS operations. The attached written materials were distributed at this meeting.

Pursuant to Section 1.1206(b) of the Commission's Rules, an original and one copy of this letter are being submitted to the Secretary's office for each of the above-captioned dockets and copies are being provided to the Commission participants in the meeting.

Respectfully submitted,



Laura H. Phillips
Counsel for Comcast
Cellular Communications, Inc.

cc: Lawrence E. Strickling, Esquire
Jeffrey E. Smith, Esquire
Mr. James R. Coltharp

No. of Copies Filed 021
Listed Below

Comcast Cellular Communications, Inc.

Presentation for

Local Competition Task Force

September 26, 1997

Major Issues for Wireless Services Regarding Local Competition

- 1. Wireless services can compete in the local exchange marketplace over time.**
- 2. Wireless services continue to become increasingly competitive within CMRS.**
- 3. Because of unique competitive dynamics, constraints in financial markets, and technological differences, the pace of wireless entry into local exchange services and the ability of wireless players to respond to policy goals will be affected in part by the extent to which public policy is more carefully tailored to those market factors.**

Wireless services can compete in the local exchange marketplace over time.

Opportunities for wireless entry into local exchange service are greatest in rural areas.

Wireless services offer distinct benefits to consumers through larger coverage areas and mobility.

Comcast has purchased PCS licenses and is extending its digital coverage to areas west of Philadelphia to Harrisburg.

Wireless carriers will address the issue of the rural cross-over point for universal service purposes to address economic issues of infrastructure costs related to local exchange replacement.

Barriers:

- (1) Infrastructure costs for landline replacement.
- (2) Prices.
- (3) Customer perceptions of use of wireless devices.

Wireless services continue to become increasingly competitive within CMRS.

Entrants in the digital wireless voice market in Philadelphia already include Comcast, Bell Atlantic Mobile, Sprint, and Nextel. AT&T Wireless and Omnipoint are each expected in October/November 1997.

Philadelphia region is:

- 2nd highest in penetration (over 20% for total market, Comcast has 9.3% as of 1996)

- Among the lowest in pricing

- Among the lowest in revenue per subscriber at \$49, including all revenue

Prices falling:

- Comcast digital service plans will be 15-40% lower than analog plans.

More flexible range of service:

- GroupTalk plan allows for lower rates for work groups.

- Service plans generally are more tailored to customer needs and preferences.

Wireless services continue to become increasingly competitive within CMRS. (continued)

Financial markets:

Compared to LECS, wireless services demonstrate:

- lower market share,
- lower overall penetration,
- greater levels of competition,
- non-guaranteed rates of return.

As a result, expectations of financial markets are based on increased risk and evaluated on cash flow rather than (guaranteed) rates of return.

Technological and licensing differences compared to landline services:

Cost of building infrastructure is higher for landline replacement in more densely populated areas.

Calling areas and rate plans reflect deployment of infrastructure geared toward traffic centers and larger market size represented by licensed territories.

Affected by greater competition and mobility.

Conclusions:

1. **The Commission should review impact of competitive inequities resulting from disparate policy treatment between wireless and wireline services.**

E911

2. **The Commission should review competitive inequities from applying policies oriented toward ILECs to wireless services.**

Number portability

Universal service

3. **Wireless services will benefit from each Commission action to determine federal-state issues independently rather than treating all telecommunications carriers as similar.**

Number portability

Interconnection, Universal service

4. **The opportunity for investment in and development of wireless services will improve through each Commission action that promotes greater certainty.**

Universal service